

### 3.3 AIR QUALITY

This section addresses short-term construction and maintenance emissions, as well as long-term emissions from irrigation pumping.

#### 3.3.1 Affected Environment

Air quality at a given location can be described by the concentration of various pollutants in the atmosphere. Units of concentration are expressed in parts per million (ppm) or micrograms per cubic meter. The significance of a pollutant concentration is determined by comparing its concentration to an applicable national and/or state ambient air quality standard. These standards represent the maximum allowable atmospheric concentrations that may occur and still protect public health and welfare with a reasonable margin of safety. The EPA establishes the National Ambient Air Quality Standards (NAAQS). The NAAQS generally are defined as the maximum acceptable ground-level concentrations that may not be exceeded more than once per year, except that annual standards may never be exceeded. California standards, established by the California Air Resources Board (CARB), are termed the California Ambient Air Quality Standards (CAAQS). The CAAQS are at least as restrictive as the NAAQS and include pollutants for which national standards do not exist. In the Arizona project region, the Arizona Department of Environmental Quality (ADEQ) has adopted the NAAQS to regulate sources of air pollution. In the Nevada project region, the Nevada Bureau of Air Pollution Control (NBAPC) has adopted the NAAQS and has promulgated additional state standards to regulate sources of air pollution.

The air pollutants of primary concern that are considered in this air quality assessment include ozone (O<sub>3</sub>), volatile organic compounds (VOCs), nitrogen oxides (NO<sub>x</sub>), and particulate matter less than 10 microns in diameter (PM<sub>10</sub>), as portions of the project region presently do not attain the national and/or California ambient air quality standards for O<sub>3</sub> and PM<sub>10</sub>. Although there are no ambient standards for VOCs or NO<sub>x</sub>, they are important as precursors to O<sub>3</sub> formation.

#### *Existing Air Quality*

Identifying the region of influence (ROI) for air quality requires knowledge of the types of pollutants being emitted, emission rates of pollutant sources, and meteorological conditions. The ROI for inert pollutants (generally pollutants other than O<sub>3</sub> and its precursors) is generally limited to a few miles downwind from a source. The ROI for O<sub>3</sub> can extend much farther downwind than for inert pollutants. Ozone is a secondary pollutant formed in the atmosphere by photochemical reactions of previously emitted pollutants, or precursors. Ozone precursors are mainly the reactive portion of VOCs and NO<sub>x</sub>. In the presence of solar radiation, the maximum effect of VOCs and NO<sub>x</sub> emissions on O<sub>3</sub> levels usually occurs several hours after they are emitted and many miles from the source.

Ozone concentrations are highest during the warmer months and coincide with the season of maximum insolation. Inert pollutant concentrations tend to be the greatest during periods of light winds and surface-based temperature inversions. These conditions limit atmospheric dispersion. However, in the case of PM<sub>10</sub> impacts from fugitive dust episodes, maximum dust

1 impacts within the project region often occur during high wind events and in proximity to  
2 manmade ground-disturbing activities.

3 The EPA designates all areas of the United States as having air quality better (attainment) or  
4 worse (nonattainment) than the NAAQS. The criteria for nonattainment designation varies by  
5 pollutant: (1) an area is in nonattainment for O<sub>3</sub> or 24-hour PM<sub>10</sub> if its NAAQS has been  
6 exceeded more than three times in 3 years and (2) an area is in nonattainment for any other  
7 pollutant if its NAAQS has been exceeded more than once per year. Former nonattainment  
8 areas that have achieved attainment of the NAAQS are designated as maintenance areas. With  
9 regard to the NAAQS for O<sub>3</sub>, Imperial County is the only part of the project region that does not  
10 attain this standard. The portions of the project region that do not attain the NAAQS for PM<sub>10</sub>  
11 include San Bernardino County and the greater Yuma region in Arizona (roughly the Colorado  
12 River from Imperial Dam to the SIB) (EPA 2003b). The project region attains all other NAAQS.

13 The attainment status designations and new rule to implement the O<sub>3</sub> 8-hour standard became  
14 effective on 15 June 2004. The EPA designates Imperial County as a marginal nonattainment  
15 area for the 8-hour O<sub>3</sub> standard (EPA 2004a). An area will attain this standard if its three-year  
16 running average of the annual fourth-highest daily maximum 8-hour O<sub>3</sub> concentration remains  
17 below 0.084 ppm. Implementation of the 1-hour O<sub>3</sub> standard will not be revoked in a given area  
18 until that area achieves this standard.

19 The EPA is in the process of implementing the new 24-hour and annual PM<sub>2.5</sub> national ambient  
20 air quality standards. On 11 February 2004, the CARB recommended to the EPA that the  
21 Imperial, San Bernardino, and Riverside county portions of the project region be designated  
22 attainment for the PM<sub>2.5</sub> NAAQS. The EPA intends to make final attainment designations in  
23 December 2004. The EPA will finalize rule development on the implementation of the PM<sub>2.5</sub>  
24 NAAQS in early 2005 (EPA 2004b).

25 The CARB also designates areas of California as being either in attainment or nonattainment of  
26 the CAAQS. An area is in nonattainment if a CAAQS has been exceeded more than once in 3  
27 years. In regard to the CAAQS, the entire project region within California presently does not  
28 attain the O<sub>3</sub> and PM<sub>10</sub> standards (CARB 2003).

#### 29 *Regulatory Setting*

30 The Federal Clean Air Act of 1969 and its subsequent amendments (CAA) establish air quality  
31 regulations and the NAAQS and delegate the enforcement of these standards to the states. In  
32 California, Arizona, and Nevada, the CARB, ADEQ, and NBAPC, respectively, are responsible  
33 for enforcing air pollution regulations. The CARB and NBAPC have in turn delegated the  
34 responsibility of regulating stationary emission sources to local air agencies. In areas that  
35 exceed the NAAQS, the CAA requires preparation of a State Implementation Plan (SIP),  
36 detailing how the states will attain the standards within mandated time frames. The CAA  
37 identifies emission reduction goals and compliance dates based upon the severity of the  
38 ambient air quality standard violation within a region.

39 The following air pollution agencies regulate air quality within the project region:

- 40 • Imperial County Air Pollution Control District, which includes all of Imperial County;

- Mojave Desert Air Quality Management District (MDAQMD), which includes San Bernardino and Riverside counties;
- The Air Quality Division in the State of Arizona; and
- Clark County Air Pollution Control District, which includes all of Clark County, Nevada.

These regulatory agencies have developed air quality attainment plans designed to reduce emissions to a level that will bring their jurisdictions into attainment of the ambient air quality standards. Each regulatory agency has also developed rules to regulate stationary sources of air pollution within their jurisdictions. Some of these rules that may apply to proposed activities include those related to open burning and fugitive dust.

Section 176(c) of the CAA contains the *General Conformity Rule* (40 CFR 51.850-860 and 40 CFR 93.150-160). The General Conformity Rule requires a Federal agency responsible for a proposed action in a NAAQS nonattainment or maintenance area to ensure that the action conforms to the applicable SIP. This means that Federally supported or funded activities will not (1) cause or contribute to any new air quality standard violation, (2) increase the frequency or severity of any existing standard violation, or (3) delay the timely attainment of any standard, interim emission reduction, or other milestone. Proposed attainment pollutant emissions are exempt from the General Conformity Rule. A Federal action would comply with an applicable SIP if it does not exceed identified annual emission *de minimis* thresholds, the magnitudes of which are based on the severity of the nonattainment rating of the project region. Actions that exceed these thresholds are required to conduct in depth conformity determinations. The requirements of the General Conformity Rule would apply to the portions of the project region within Imperial County (O<sub>3</sub> nonattainment area), San Bernardino County (PM<sub>10</sub> nonattainment area), and the greater Yuma area (PM<sub>10</sub> nonattainment area).

Reclamation has yet to identify specific locations or designs for the development of the proposed conservation measures. Therefore, it is not possible to accurately locate and quantify the emissions from the proposed action for the purpose of determining conformity since they are not deemed reasonably foreseeable. The General Conformity Rule allows a Federal agency to defer a conformity analysis for a programmatic action of this nature until project-specific information is available upon which to base the analysis (EPA 1993). As a result, the conformity analysis for the proposed action would occur at a future date in association with project-specific proposals.

### *Climate and Meteorology*

The project region has an arid continental climate, which is characterized by hot summers, mild winters, low humidity, and large diurnal variations in temperature. The aridity of this region is due to a combination of factors, including (1) the presence of a semi-permanent atmospheric high pressure system that shields the regions from the passage of polar storm systems, (2) a cool ocean to the west that provides limited amounts of moisture, and (3) the rain shadow effects of the Coast Ranges, which blocks the flow of moisture into the region from the Pacific Ocean. This arid condition produces low soil moisture, which is responsible for one of the main air pollution problems in the region, fugitive dust (PM<sub>10</sub>).

#### 3.3.2 Environmental Consequences

##### *Significance Criteria*

An impact would be significant if proposed air emissions:

- conflict with or obstruct implementation of an applicable air quality plan;
- violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable Federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors);
- expose sensitive receptors to substantial pollutant concentrations; or
- create objectionable odors affecting a substantial number of people.

##### *3.3.2.1 Alternative 1: Proposed Conservation Plan*

Air quality impacts would result from (1) combustive emissions due to the use of fossil fuel-fired construction and maintenance equipment; (2) fugitive dust (PM<sub>10</sub>) emissions due to earth-moving activities and the use of vehicles on unpaved surfaces; (3) the use of fire to clear vegetation, burn cleared vegetation, or maintain marsh vegetation; and (4) potential odorous emissions from dredged materials. Air quality impacts would be both short-term and long-term: (1) short-term impacts would occur during the development of individual conservation area establishment projects and the construction of field and fish-rearing facilities, and (2) long-term impacts would result from the maintenance and operation of the conservation projects. Maintenance activities would produce fugitive dust emissions from the occasional use of mobile equipment on unpaved roads. These activities and sources would produce minor amounts of daily emissions.

##### *Impacts*

Ground-disturbing activities required for habitat establishment in conservation areas would not conflict with or obstruct implementation of an applicable air quality plan. Several air pollution agencies regulate air quality within the project region. These regulatory agencies have developed air quality plans designed to control emissions to a level that will either bring their jurisdictions into attainment of the ambient air quality standards or maintain these standards. Each agency adopts the attainment strategies into their applicable regional and state air regulations. Some of the regulations that may apply to the proposed action include those related to open burning and fugitive dust. The lead agencies would ensure that proposed habitat establishment activities would comply with these air regulations. Additionally, activities such as earth-moving and prescribed burns are common in the planning area, and such emissions are considered in the air quality attainment plans. Moreover, if agricultural land were used for LCR MSCP conservation projects, future emissions from cultivation and prescribed burns on these lands would not occur. Thus, the use of agricultural sites for LCR

MSCP projects would reduce the long-term potential for PM<sub>10</sub> standard exceedances to occur on these sites.

**Impact AQ-1: The use of fossil fuel-fired construction equipment during construction, maintenance, and operational activities would result in intermittent combustive emissions that would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.** Due to the mobile and intermittent nature of construction sources (the proposed action would occur over a period of about 30 years at varying locations along the LCR), combustive emissions would not produce substantial impacts at any particular location and would result in *less than significant* air quality impacts. Maintenance of individual conservation projects would require the occasional use of fossil fuel-fired mobile equipment, and irrigation would require the use of water pumps, some of which would use diesel fuel. These activities and sources would produce minor amounts of daily emissions, which would be dispersed throughout the planning area. As a result, maintenance and operational emissions associated with implementation of the Conservation Plan would not produce substantial impacts at any particular location and would result in *less than significant* air quality impacts.

**Impact AQ-2: The development of the largest projects would produce fugitive dust emissions that could exceed an ambient 24-hour PM<sub>10</sub> standard.** Fugitive dust (PM<sub>10</sub>) emissions from the use of mobile equipment on bare soils would occur at a rate of about 0.5 tons per acre per day of activity (EPA 1995). The size of daily disturbances from proposed activities could range from less than 1 acre for small projects (100 acres or less) on undeveloped lands to up to 5 acres for large projects (500 to 1,000 acres) on agricultural lands. Therefore, unmitigated PM<sub>10</sub> emissions from these activities would range from less than 0.5 to 2.5 tons per day. Fugitive dust emissions currently occur within the planning area, especially from cultivation activities on agricultural lands. Development of conservation areas on agricultural lands would produce a net reduction in PM<sub>10</sub> emissions on lands periodically cultivated, since the development emissions would occur only once. Fugitive dust emissions from the development of the largest projects would be substantial enough to have the potential to contribute to an exceedance of an ambient 24-hour PM<sub>10</sub> standard. These potential exceedances would only occur in isolated locations that are immediately adjacent to the property line of each development site. If agricultural sites were used, the fugitive dust emissions from construction activities would replace some portion of the fugitive dust emissions that would occur as a result of common agricultural activities. This would minimize the potential for an increase in the number of PM<sub>10</sub> standard exceedances in the vicinity of these lands. However, to be conservative, it is determined that PM<sub>10</sub> emissions from the largest projects would produce *significant and potentially unavoidable* air quality impacts.

**Impact AQ-3: Emissions from the largest prescribed burns during terrestrial vegetation establishment or maintenance activities would produce emissions that could contribute to an exceedance of an ambient 24-hour PM<sub>10</sub> standard.** The use of fire represents the largest source of air emissions from the establishment of vegetation. Emissions would vary, depending on the fuel type, the mass of fuel per area, the fuel moisture content, and atmospheric conditions. For example, burns to clear vegetation on harvested agricultural lands would produce fewer emissions than those that would occur in areas with a higher fuel density, such as saltcedar stands. Prescribed burn activities currently occur within the project region, especially on agricultural lands where it is commonly used to clear vegetation. Burning agricultural lands for

the purpose of developing habitat could produce a net reduction in burn emissions on lands burned periodically, since this activity would occur only once. The air pollutant of most concern that occurs from prescribed burns is PM<sub>10</sub>. Emission factors for burn activities are not available for most of the vegetation types that would be affected; however, they have been established for grass (10 pounds of PM<sub>10</sub> per ton) and sagebrush (30 pounds of PM<sub>10</sub> per ton) (EPA 1996). The largest prescribed burns would produce substantial amounts of PM<sub>10</sub> emissions that could contribute to an exceedance of an ambient 24-hour PM<sub>10</sub> standard. These potential exceedances would only occur in isolated locations that are immediately adjacent to the property line of each burn area. If agricultural sites were used, the PM<sub>10</sub> emissions from construction activities would replace some portion of the PM<sub>10</sub> emissions that would occur as a result of common agricultural activities. This would minimize the potential for an increase in the number of PM<sub>10</sub> standard exceedances in the vicinity of these lands. However, to be conservative, it is determined that PM<sub>10</sub> emissions from the largest prescribed burns would produce *significant and potentially unavoidable* air quality impacts.

**Impact AQ-4: Air emissions from proposed conservation area establishment activities and facility construction could exceed the MDAQMD daily NO<sub>x</sub> or PM<sub>10</sub> emission significance thresholds, which would result in a cumulatively considerable net increase of a nonattainment pollutant.** The MDAQMD is the only air jurisdiction within the project region that uses quantitative thresholds to determine the significance of proposed emissions for CEQA or NEPA purposes. These daily thresholds are (1) 137 pounds of VOC, (2) 548 pounds of carbon monoxide, (3) 137 pounds of NO<sub>x</sub>, (4) 137 pounds of oxides of sulfur, and (5) 82 pounds of PM<sub>10</sub>. Development of the largest conservation establishment projects or prescribed burn actions could produce emissions in excess of one or more of these daily thresholds. For example, daily use of several large pieces of diesel-powered construction equipment could produce emissions in excess of the daily NO<sub>x</sub> threshold. Additionally, fugitive dust emissions from the development of the largest projects, as described under **Impact AQ-2**, could exceed the daily PM<sub>10</sub> threshold. If construction activities produced emissions that exceeded the NO<sub>x</sub> or PM<sub>10</sub> daily threshold, they would result in cumulatively considerable net increases of a nonattainment pollutant (O<sub>3</sub> or PM<sub>10</sub>).

If emissions exceed a significance threshold described above, further analysis of the emissions and their consequences would be performed to assess whether there was likelihood of a significant impact to air quality. The nature and extent of such analysis would depend on the specific circumstances. The analysis could range from simply a more detailed and precise examination of the likely emitting activities and equipment, to air dispersion modeling analyses. If project emissions were determined to increase ambient pollutant levels from below to above a national or state ambient air quality standard, these emissions would be *significant*.

**Impact AQ-5: Air emissions from the proposed conservation area establishment activities would not expose sensitive receptors to substantial pollutant concentrations.** Due to the rural nature of the project region, air emissions from this alternative would not occur in proximity to a substantial number of people or sensitive receptors. As a result, this alternative would not expose sensitive receptors to substantial pollutant concentrations. Therefore, the proposed action would produce *less than significant* air quality impacts to sensitive receptors.

**Impact AQ-6: Air emissions from the proposed conservation area establishment activities would not create objectionable odors that affect a substantial number of people.** Due to the

rural nature of the project region, air emissions from the alternative would not occur in proximity to a substantial number of people. Exposure of wet sediments to the atmosphere from dredging activities could produce offensive emissions from the decomposition of organic matter; this is unlikely, however, because such matter typically is not contained within the sandy material that is usually dredged along the LCR. Additionally, due to the intermittent nature of this emission source and low population density of the project region, odorous emissions from the proposed action would not affect a substantial number of people. As a result, odorous emissions would produce *less than significant* air quality impacts.

#### Mitigation Measures

**AQ-1** One or more of the following measures shall be implemented as standard operating practices to minimize fugitive dust (PM<sub>10</sub>) emissions during construction activities. (*Addresses Impacts AQ-2 and AQ-4*)

1. Comply with applicable local and state rules that regulate proposed sources of fugitive dust.
2. Apply water or other dust palliatives to areas where vehicles and equipment perform ground-disturbing activities on dry soil. Effective application of water would reduce fugitive dust emissions by at least 50 percent from these areas.
3. Reduce dust from dirt roads used by project equipment with the use of pavement, gravel, water, or non-toxic soil stabilizers.
4. Increase water applications or reduce ground-disturbing activities as wind speeds increase. Curtail ground-disturbing activities when sustained wind speeds exceed 25 miles per hour.
5. Minimize the amount of disturbed area.
6. Cover inactive soil stockpiles or treat them with soil binders, such as crusting agents or water them to keep moist.
7. Cover trucks that haul soils or fine aggregate materials.
8. Clean dirt from construction vehicle tires and undercarriages when leaving the construction site and before entering local roadways.
9. Sweep streets near the construction area at the end of the day if soil track-out occurs on these roadways.
10. Designate personnel to monitor dust control program activities to ensure that they effectively minimize fugitive dust emissions.

**AQ-2** A smoke management plan shall be implemented for all construction and maintenance activities involving the use of fire. (*Addresses Impact AQ-3*) This plan shall include, as a minimum, the following components:

1. Obtain local or state air permits prior to each burn event, if applicable.
2. Perform burns when conditions minimize burn emissions, such as low fuel moisture, warm temperatures, and adequate wind speeds.

3. Avoid periods of stagnant atmospheric conditions that inhibit smoke dispersion, such as early morning hours during the presence of a strong surface-based inversion.
4. Review the most recent National Weather Service weather predictions that apply during the time of the burn event as a means to estimate the direction of smoke transport during the burn period. Postpone the burn event if weather predictions show that winds would transport smoke in the direction of nearby residences or sensitive receptors.
5. Prior to each burn event, clear the burn area of any combustible non-vegetative materials, such as plastics or chemicals.
6. Do not conduct burns if a non-project burn is proposed to occur simultaneously in proximity to the project burn.
7. When feasible, do not conduct burns in proximity to residents, sensitive receptors, or gatherings of a substantial number of people.
8. Consider the use of measures to minimize burn emissions, such as forced air or air curtain ventilation techniques.
9. Direct personnel to monitor proposed burns to ensure that this plan will effectively minimize burn emissions.
10. Include burn suppression contingency strategies.

#### *Residual Impacts*

**Mitigation Measure AQ-1** would reduce fugitive dust emissions from project activities. The exact site sizes and locations and construction methods are not known; thus, even with mitigation, the emissions from the development of the largest projects may still exceed the significance criteria considered in **Impacts AQ-2 and AQ-4**. Therefore, residual impacts of PM<sub>10</sub> emissions from the development of the largest projects would be *potentially significant*.

**Mitigation Measure AQ-2** would reduce combustive emissions from prescribed burns. However, mitigated burn emissions could be sufficiently substantial to contribute to an exceedance of an ambient 24-hour PM<sub>10</sub> standard. Therefore, residual impacts associated with the largest prescribed burns under **Impact AQ-3** would be *potentially significant*.

#### **3.3.2.2 Alternative 2: No Action Alternative**

Under the no action alternative, it is likely that conservation measures similar to those included in the proposed action would be implemented since compliance with the ESA still would be required for the covered actions, although some conservation could occur in the off-site conservation areas (as described in section 3.3.2.4 below), as well as along the LCR. **Impacts AQ-1 through AQ-6** generally apply to Alternative 2, although none of the off-site conservation areas are located within California; therefore, **Impact AQ-4** would not apply to conservation implemented in these areas. The no action alternative is likely to result in the establishment of less riparian vegetation than the proposed action, and the projects involving maintenance of existing habitat that would be funded would not likely occur under the no action alternative. Since the no action alternative would develop fewer acres of conservation area than the proposed action, proportionately fewer air quality impacts would result from grading, clearing,

and other actions directly associated with the establishment of conservation areas. Since more, smaller mitigation sites would be established, however, requiring more infrastructure (access roads and irrigation pipelines/ canals and pump facilities), greater air quality impacts would be expected to result from the construction of these facilities than under the proposed action. The precise differences between this alternative and the proposed action cannot be quantified since specific projects have not been identified at this time; however, overall air quality impacts likely would be similar.

#### *Mitigation Measures*

Mitigation measures would be developed as appropriate in the course of project-specific environmental reviews. If significant impacts were identified, mitigation measures similar to those identified in this EIS/EIR (**Mitigation Measures AQ-1** and **AQ-2**) could be implemented. Developing and implementing such mitigation measures is outside the authority of the lead agencies and is beyond the scope of this EIS/EIR.

#### *Residual Impacts*

As described above, the exact site sizes and locations and construction methods are not known; thus, even with mitigation identified in **Mitigation Measures AQ-1** and **AQ-2**, the emissions from the development of the largest projects may still exceed the significance criteria considered in **Impacts AQ-2** and **AQ-4**. Therefore, residual impacts of PM<sub>10</sub> emissions from the development of the largest projects would be *potentially significant*. Implementation of **Mitigation Measure AQ-2** would reduce combustive emissions from prescribed burns. However, mitigated burn emissions could be sufficiently substantial to contribute to an exceedance of an ambient 24-hour PM<sub>10</sub> standard. Therefore, residual impacts associated with the largest prescribed burns under **Impact AQ-3** would be *potentially significant*.

#### **3.3.2.3 Alternative 3: Listed Species Only**

**Impacts AQ-1 through AQ-6** apply to Alternative 3. It is estimated that Alternative 3 would develop fewer acres of conservation area than the proposed action, which generally would result in proportionately fewer air quality impacts.

#### *Mitigation Measures*

**Mitigation Measures AQ-1 and AQ-2** apply to Alternative 3.

#### *Residual Impacts*

**Mitigation Measure AQ-1** would reduce fugitive dust emissions from project activities. The exact site sizes and locations and construction methods are not known; thus, even with mitigation, the emissions from the development of the largest projects may still exceed the significance criteria considered in **Impacts AQ-2** and **AQ-4**. Therefore, residual impacts of PM<sub>10</sub> emissions from the development of the largest projects would be *potentially significant*.

**Mitigation Measure AQ-2** would reduce combustive emissions from prescribed burns. However, mitigated burn emissions could be sufficiently substantial to contribute to an

exceedance of an ambient 24-hour PM<sub>10</sub> standard. Therefore, residual impacts associated with the largest prescribed burns under impact AQ-3 would be *potentially significant*.

#### 3.3.2.4 Alternative 4: Off-Site Conservation

**Impacts AQ-1, AQ-2, AQ-3, AQ-5 and AQ-6** apply to Alternative 4. Air emissions from the implementation of Alternative 4 would be comparable to those of the proposed action. Although activities associated with Alternative 4 would occur in slightly different locations than those proposed for Alternative 1 (with the exception of backwater establishment and other conservation measures specific to fish), the existing background pollutant levels do not differ substantially between these areas. The Muddy, Virgin, and Bill Williams rivers air shed areas all attain the ambient air quality standards, as does most of the project region under Alternative 1. Additionally, the lower Gila River area is within the Yuma PM<sub>10</sub> nonattainment area, which also encompasses portions of the Alternative 1 project region along the LCR from about Imperial Dam to the SIB. None of the off-site conservation areas are located within California; therefore, the impacts identified in **Impact AQ-4** would not apply to this alternative, nor would the discussion of the CAAQS.

#### Mitigation Measures

**Mitigation Measures AQ-1 and AQ-2** apply to Alternative 4.

#### Residual Impacts

**Mitigation Measure AQ-1** would reduce fugitive dust emissions from project activities. The exact site sizes and locations and construction methods are not known; thus, even with mitigation, the emissions from the development of the largest projects may still exceed the significance criteria considered in **Impacts AQ-2 and AQ-4**. Therefore, residual impacts of PM<sub>10</sub> emissions from the development of the largest projects would be *potentially significant*.

**Mitigation Measure AQ-2** would reduce combustive emissions from prescribed burns. However, mitigated burn emissions could be sufficiently substantial to contribute to an exceedance of an ambient 24-hour PM<sub>10</sub> standard. Therefore, residual impacts associated with the largest prescribed burns under impact AQ-3 would be *potentially significant*.